

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division

ROBERT DAVID STEELE et al

Plaintiffs,

V.

JASON GOODMAN et al

Defendants.

Case 3:17-cv-601-MHL

**PLAINTIFFS' REVISED MOTION FOR ENTRY  
OF A PROTECTIVE ORDER**

Plaintiffs, Robert David Steele and Earth Intelligence Network (“Plaintiffs”), by counsel, pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, Local Civil Rule 7 and the Court’ Order [*ECF No. 158*], respectfully move the Court to enter a Protective Order.

A proposed Protective Order agreed to by Plaintiffs and Defendant Negron is attached hereto as *Exhibit “A”*.

The arguments and legal bases for this motion are stated more fully in Plaintiffs' Memorandum in Support, being filed contemporaneously with this motion.

## CERTIFICATION

In accordance with Local Civil Rule 37(E), Counsel for Plaintiffs, Counsel for Defendant Negron and Defendant Goodman *pro se* have conferred in good faith. Counsel for Defendant Negron approves the form of the Protective Order attached to this motion, and does not oppose this motion.

Defendant Goodman has requested additions to the Protective Order. Plaintiffs and Defendant Negron do not agree to include those additions.

**REQUEST FOR RELIEF**

For the reasons stated above, Plaintiffs respectfully request the Court to grant their revised motion, and enter the attached Protective Order.

DATED: August 7, 2019

ROBERT DAVID STEELE  
EARTH INTELLIGENCE NETWORK

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*Counsel for the Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 7, 2019 a copy of the foregoing was filed electronically using the Court's CM/ECF system, which will send notice of electronic filing to counsel for Defendant, Patricia A. Negron, and all interested parties receiving notices via CM/ECF. I also certify that a copy of this pleading was emailed in PDF to Defendants, Goodman and Lutzke.

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